

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING, LTD., *et al.*,<sup>1</sup>

Debtors.

SUNIL KAVURI, AHMED ABD-EL-RAZEK  
NOIA CAPITAL SÀRL and PAT RABITTE,

Plaintiffs,

v.

FTX TRADING, LTD., *et al.*,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Proc. No. 24-50012 (JTD)

**MOTION TO CERTIFY CLASS, APPOINT CLASS  
REPRESENTATIVE(S) AND APPOINT CLASS COUNSEL**

Sunil Kavuri, Ahmed Abd-El-Razek and Pat Rabitte, each in their individual and representative capacities as more fully set forth below (collectively, the “Class Action Plaintiffs”), respectfully move this Court (the “Motion”), pursuant to Federal Rule of Civil Procedure 23, made applicable to this matter by Federal Rules of Bankruptcy Procedure 7023 and 9014, for entry of an order certifying a class consisting of all customers of FTX.com, who personally have held accounts on the FTX.com platform with positive balances since of November 11, 2022 (the “Class”), appointing Class Action Plaintiffs as Class representatives, and appointing their counsel, McCarter & English LLP, as class counsel. Class Action Plaintiffs set forth the reasons in support of this Motion in their brief filed together with this Motion.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

Dated: June 25, 2024

**MCCARTER & ENGLISH, LLP**

/s/ Shannon D. Humiston

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